

EXHIBIT 7

Rendon, Carole S.

From: Mark Pifko <MPifko@baronbudd.com>
Sent: Friday, December 14, 2018 2:08 PM
To: David@SpecialMaster.Law; Rendon, Carole S.
Cc: xALLDEFENDANTS-MDL2804-Service@arnoldporter.com;
MDL2804discovery@motleyrice.com
Subject: Deposition Subpoena to Ms. Carole Rendon
Attachments: Letter to Ms Olson - Touhy Request for Rendon Testimony.pdf; Letter to Mr Herdman -
Touhy Request for Rendon Testimony.pdf

Special Master Cohen and Ms. Rendon:

As you know, on December 5, 2018, I served a subpoena seeking deposition testimony from Ms. Rendon. Today, I sent a Touhy letter to Ms. Lisa Olson from the United States Department of Justice, which discusses the basis for Plaintiffs' request for testimony from Ms. Rendon. A copy of that letter is attached. I note that prior to serving Ms. Rendon with the subpoena, on December 4, 2018, a letter was sent to Ms. Rendon's successor Justin Herdman. However, Mr. Herdman, like Ms. Rendon's predecessor, Steve Dettelbach, recused himself from involvement with the opiate litigation, so I do not believe Mr. Herdman reviewed the December 5, 2018 letter. In any event, for the sake of completeness, a copy of that letter is attached here as well.

Under the circumstances, which are discussed in the letter to Ms. Olson, we ask that Ms. Rendon and her firm immediately cease from any further involvement in this case until this issue can be resolved. We also ask that Ms. Rendon and any counsel who may communicate with the Department of Justice on this topic provide us with copies of any written submissions that have been or will be provided in the future. Additionally, we ask Defendants' counsel to confirm whether anyone has communicated with the Department of Justice concerning this issue. For example, former Attorney General Eric Holder works for Covington and that firm represents McKesson in this matter. It would be improper for Ms. Rendon or Defendants to attempt to influence the decision-making process through any connections they may have with the Department of Justice. Thus, to avoid any confusion, we ask that they be ordered not to do so and to disclose whether any such attempts have already occurred.

Finally, Ms. Rendon's deposition is presently noticed for January 10, 2019. To avoid any delay, if she intends to file a motion to quash, we ask that a briefing schedule for any such motion be set now so that it can be resolved sufficiently in advance of her deposition.

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